

## Jessica Harvey

It is time to assess inert ingredients. There must be no more delay:- The first step must be the immediate publication in the Federal Register of all “inerts” known to be used in organic production, with a request that registrants of products approved for use in organic production to notify AMS if their products contain other “inert” ingredients.- USDA must allocate resources needed to review substances that are identified.- Former List 3 “inerts” must be relisted according to the Spring 2012 NOSB recommendation.- USDA must establish a process for production of technical reviews of substance on former Lists 4A and 4B.- The NOSB must evaluate the substances according to a process designed to complete the review of all “inerts” within five years of publication of the list, and USDA must complete rulemaking in accordance with OFPA and NOSB recommendations.- Known endocrine disrupting and persistent organic pollutants—such as nonylphenol ethoxylates (NPEs), per- and polyfluoroalkyl substances (PFAS), bisphenols, and ortho-phthalates—should not be permitted.- Every five years the materials will be subject to sunset review.